

CORRES. CONTROL
INCOMING LTR NO.

04093 RF94

DUE
DATE

ACTION

DIST.	LTR	ENC
BURLINGAME, A.H.		
BUSBY, W.S.		
CARNIVAL, G.J.		
CORDOVA, R.C.		
DAVIS, J.G.		
FERRERA, D.W.		
FRAY, R.E.		
GEIS, J.A.		
GLOVER, W.S.		
GOLAN, P.M.		
HANNI, B.J.		
HEALY, T.J.		
HEDAHL, T.G.		
HILBIG, J.G.		
HUTCHINS, N.M.		
JACKSON, D.T.		
KELL, R.E.		
KUESTER, A.W.		
MARX, G.E.		
MCDONALD, M.M.		
McKENNA, F.G.		
MORGAN, R.V.		
PIZZUTO, V.M.		
POTTER, G.L.		
SANDLIN, N.B.		
SATTERWHITE, D.G.		
SCHUBERT, A.L.		
SCHWARTZ, J.K.		
SETLOCK, G.H.		
STIGER, S.G.		
TOBIN, P.M.		
VOORHEIS, G.M.		
WILSON, J.M.		
KEITH S	X	X
LONDON K	X	X
HOLLOWELL L	X	X

CORRES. CONTROL	X	X
ADMN RECORD/080	X	2
PATS/T130G		



Department of Energy

ROCKY FLATS OFFICE
P.O. BOX 928
GOLDEN, COLORADO 80402-0928

45950

Nov 3 12 05 PM '94

OCT 26 1994

EG&G
ROCKY FLATS PLANT
DOE-08629 CONTROL

Mr. Joe Schieffelin, Unit Leader
Hazardous Waste Control Program
Colorado Department of Public Health and Environment
4300 Cherry Creek Drive South
Denver, Colorado 80222-1530

Dear Mr. Schieffelin:

The Department of Energy (DOE) requests the Colorado Department of Public Health and Environment and the Environmental Protection Agency's concurrence with our proposal to implement subsection 3.1.3.3 of the Final Interim Measure/Interim Remedial Action (IM/IRA) Decision Document (DD) for Solar Evaporation Ponds Operable Unit 4, as described in the enclosure. The evaporators were installed, per the IM/IRA DD due to concerns over the ability of the plant waste treatment facility, Building 374, to treat the volume of Temporary Modular Storage Tank (TMST) water. Last year, DOE performed significant maintenance on the Building 374 treatment facility. Operations in Building 910 have been suspended while EG&G determines whether Building 374 can effectively process the TMST water. Operations will resume if problems arise with Building 374.

Since Building 910 is in "stand by" mode, DOE is proposing a change of the inspection schedule from the current daily inspection of the tank systems to a monthly inspection.

The DOE also requests concurrence from CDPHE that monthly inspections will fulfill state inspection requirements, while Building 910 is in a stand-by condition.

Sincerely,

Steven W. Slaten
IAG Project Coordinator
Environmental Restoration

Enclosure

Reviewed for Addressee
Corres. Control RFP

11-3-94 R04
DATE BY

Ref Ltr. #

DOE ORDER # 5400.1

ADMIN RECORD

Schieffelin
94-DOE-08629

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OCT 26 1994

cc w/ Enclosure:
K. Ahlstad, CDPHE
L. Weers, CDPHE
M. Hestmark, EPA
J. Roberson, AMER, RFFO
F. Lockhart, ER, RFFO
D. Mauer, WPD, RFFO
S. Howard, SAIC,
M. Witherill, SAIC
S. Keith, EG&G
K. London, EG&G

Request for Approval to Change Building 910 Inspection Schedule

The change in the inspection schedule would affect the following tanks:

D-56 Feed Mix Tank
D-6001-1 Brine
D-6001-2 Brine
D-6001-3 Brine
D-6005-1 Brine
D-6005-2 Brine
D-6005-3 Brine

D-4001-1 Distillate
D-4001-2 Distillate
D-4001-3 Distillate
D-4008-1 Distillate
D-4008-2 Distillate
D-4008-3 Distillate

There are several tanks that should remain on a daily inspection since they still have a possibility of receiving waste liquid. They are as follows:

D-57, B910 Sump Tank
D-50, B910 Flush Water Tank
D-18, B910 Brine Tank
D-9, B910 Brine Tank
Unit 38, Bermed area Modular Storage Tank transfer piping

The feed line from the Temporary Modular Storage Tanks will be blanked to virtually preclude any possibility of waste water entering the system. The tanks and piping downstream of this location are the ones being proposed for reduced inspection frequency. The daily inspections are not necessary to ensure protection of the human health and the environment because Building 910's evaporators and tank systems are not in operation and have been rinsed and drained.

All drained tanks and associated piping (including ancillary equipment) are vented to the atmosphere. Piping systems are not graded per se to impede or prevent fluid flow, but the source of fluid introduction is controlled at its source as mentioned above. Building 910 will be maintained in a "stand-by" condition through fiscal year 1995. Should a situation arise where EG&G would need to reintroduce hazardous waste into the building, daily inspections would be performed until such time as the waste was removed and the building once again placed into stand-by condition.

Presented below are the requirements listed in §264.195 and a short description of how EG&G will satisfy the requirement.

§264.195 - INSPECTIONS

- a) *The owner or operator must develop and follow a schedule and procedure for inspecting overfill controls.*

Hazardous waste cannot be introduced into the system because the feed line has been sealed off, so that tanks cannot overfill.

The overfill controls will be tested as a part of start-up should the tank be used during the stand-by period.

- b) *The owner or operator must inspect at least once each operating day:*

The tank systems will not be operated; they will, however, be inspected on a monthly schedule as best management practices. The inspection logsheet that is currently filled out by Building 910 inspection personnel will be modified to include which inspections will be performed on a monthly basis and which ones will continue to be performed weekly. Upon State of Colorado acceptance, the proposed changes will be incorporated into the current inspection logsheets. The only change would be in inspection frequency. The intent of the inspection will be fully understood by Building 910 personnel trained at performing RCRA inspections. The unchanged inspections still require the utmost integrity to ensure all parameters are within specification and no leakage has occurred.

1) Above ground portions of the tank system, if any, to detect corrosion or releases of waste;

There will not be any waste in the tank to cause corrosion or leak from the tank because the tanks have been rinsed and drained.

2) Data gathered from monitoring and leak detection equipment, e.g., pressure or temperature gauges, monitoring wells: to insure that the tank system is being operated according to its design; and

Leak detection and monitoring is by visual inspection. The tanks are drained, rinsed and are not being operated.

The tank system will be inspected on a monthly schedule as a best management practice.

3) The construction materials and the area immediately surrounding the externally accessible portion of the tank system, including the secondary containment system, (e.g., dikes) to detect erosion or signs of releases of hazardous waste (e.g., wet spots, dead vegetation). [NOTE - Section 264.15 (c) requires the owner or operator to remedy any deterioration or malfunction he finds. Section 264.196 requires the owner or operator to notify the Director within 24 hours of confirming a leak. Also, 40 CFR Part 302 may require the owner or operator to notify the National Response Center of a Release]

There will not be any waste in the tank.

(c) This requirement is not addressed because there is no cathodic protection required for these tank systems

(d) The owner or operator must document in the operating record of the facility an inspection of those items in paragraphs (a) through (c) of this section.

Records for the monthly inspections will be maintained for those items in (a) through (c) of this section.